

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

	X	
In re:	:	
	:	
THE FINANCIAL OVERSIGHT AND	:	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	:	Title III
	:	
as representative of	:	Case No. 17-BK-3283 (LTS)
	:	
THE COMMONWEALTH OF PUERTO RICO <i>et</i>	:	(Jointly Administered)
<i>al.</i> ,	:	
	:	
Debtors. ¹	X	

**MOTION TO INFORM APPEARANCE OF WHITEFISH ENERGY HOLDINGS, LLC
AT OMNIBUS HEARING SCHEDULED FOR
APRIL 28-29, 2021**

TO THE HONORABLE COURT:

COME NOW Whitefish Energy Holdings, LLC (“WEH”), in compliance with this Honorable Court’s *Order Regarding Procedures for April 28-29, 2021, Omnibus Hearing* [Dkt. No. 15902] (the “**Procedures Order**”),² and respectfully states as follows:

1. Carmen D. Conde Torres, Esq. will appear on behalf of WEH at the April 28-29,

¹ The Debtors in these title III cases, along with each Debtor's respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566(LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801).

² Capitalized terms used herein and otherwise not defined shall have the meaning ascribed to such term in the Procedures Order.

2021 Omnibus Hearing (the “Omnibus Hearing”), which will be conducted telephonically via CourtSolutions.

2. Ms. Conde Torres will present oral argument related to the following pleadings:
 - a. *Government Parties’ Motion for Order Allowing Administrative Claims for Amounts to be Paid to LUMA Energy by PREPA During Interim Period under Supplemental Agreement and the T&D Contract (the “LUMA Motion”)* (Dkt. No. 2417)
 - b. *Limited Objection of Whitefish Energy Holdings, LLC to Government Parties’ Motion for Order Allowing Administrative Claims For Amounts to Be Paid to Luma Energy by PPREPA During Interim Period Under Supplemental Agreement and the T&D Contract* (Dkt. No. 2436)
 - c. *Omnibus Reply in Support of Government Parties’ Motion for Order Allowing Administrative Expense Claim for Amounts to be Paid to Luma Energy by PREPA During Interim Period Under Supplemental Agreement and T&D Contract* (Dkt. 2458)

3. In addition, WEH reserves the right to be heard and present oral argument to address any matter identified in the agenda to be filed by the Oversight Board in connection with the Omnibus Hearing, or raised by any party at the Omnibus Hearing related to the Title III cases or any adversary proceeding which may affect the interests of the WEH. WEH reserves the right to amend this Informative Motion as needed.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 23rd day of April 2021.

WE HEREBY CERTIFY that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to the parties appearing in said system including the US Trustee and to all those parties registered to receive notice within the electronic notification service.

C. CONDE & ASSOC.

/s/Carmen D. Conde Torres

Carmen D. Conde Torres, Esq.

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/s/Luisa S. Valle Castro

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